

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: DRAFT

Region: Mooresville Regional Office
County: Union
NC Facility ID: 9000117
Inspector's Name: Jim Hafner
Date of Last Inspection: 02/22/2017
Compliance Code: 3 / Compliance - inspection

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): OMNOVA Solutions, Inc.</p> <p>Facility Address: OMNOVA Solutions, Inc. 2011 Rocky River Road North Monroe, NC 28110</p> <p>SIC: 2754 / Commercial Printing, Gravure NAICS: 323111 / Commercial Gravure Printing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: 15A NCAC 02Q .0513 NSPS: N/A NESHAP: N/A PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): N/A Other: N/A</p>
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Contact Data			Application Data
<p style="text-align: center;">Facility Contact</p> <p>Jeff Hardin SH&E Manager (704) 225-2010 2011 Rocky River Road North Monroe, NC 28110</p>	<p style="text-align: center;">Authorized Contact</p> <p>Kathy Brown Plant Manager (704) 225-2040 2011 Rocky River Road North Monroe, NC 28110</p>	<p style="text-align: center;">Technical Contact</p> <p>Jeff Hardin SH&E Manager (704) 225-2010 2011 Rocky River Road North Monroe, NC 28110</p>	<p>Application Number: 9000117.17A Date Received: 01/30/2017 Application Type: Renewal Application Schedule: TV-Renewal</p> <p style="text-align: center;">Existing Permit Data</p> <p>Existing Permit Number: 03281/T26 Existing Permit Issue Date: 03/02/2015 Existing Permit Expiration Date: 10/31/2017</p>

Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2015	0.0100	2.62	70.23	2.20	0.1900	10.00	5.68 [Toluene]
2014	0.0200	4.39	68.86	3.68	0.3300	10.23	5.84 [Toluene]
2013	0.0200	4.26	63.63	3.58	0.3300	19.09	10.69 [Toluene]
2012	0.0200	4.01	64.47	3.37	0.3100	15.92	8.38 [Toluene]
2011	0.0200	3.97	61.92	3.33	0.3000	15.59	8.41 [Toluene]

<p>Review Engineer: Kevin Godwin</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 03281/T27 Permit Issue Date: _____ Permit Expiration Date: _____</p>
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I. Introduction

- A. According to renewal application no. 9000177.17A, OMNOVA Solutions, Inc. operates a rotogravure printing operation at this Union County site. The existing permit covers sources including five (5) rotogravure printing presses (ID Nos. 1, 2, 3, 4, and 6) and two (2) natural gas/propane-fired regenerative thermal oxidizers (ID Nos. C2 and C3).

Additionally, there are a number of insignificant activities, including:

IC-130	Ink mix room used to mix and blend inks, coatings, and solvents for production.
IC-150	Press room mixers & miscellaneous cleaning process to clean mixers and misc. items.
IC-160	R&D, QC and color match areas used to develop color, customer samples and engineer product.
IC-170	Solvent tank farm consisting of fourteen tanks: <ul style="list-style-type: none">• Eight (8) tanks at 3000 gallons each• Three (3) vertical solvent tanks at 6000 gallons each• Three (3) tanks at 6000 gallon each used for recyclable material
IC-180	Propane storage tank & vaporizer at 30,000 gallons. L.P. tank used to replace natural gas usage when the gas company curtails the facility.
IC-190	Floor cleaning - press room manual mop and bucket process used to clean the floor.
IC-200	Container, tank and vessel cleaning process of cleaning the tanks of leftover ink residues for reuse.
IC-220	Maintenance activities
IES12	Cleaver Brooks boiler natural gas/LPG-fired boiler (5.23 million Btu per max heat input)
IC-GEN1 MACT Subpart ZZZZ	Natural gas-fired emergency generator (170 kilowatts)

- B. The application to renew the existing Title V air quality permit was received on January 30, 2017 or within nine months prior to permit expiration, and is currently covered by the application shield provided in 15A NCAC 02Q .0512.
- C. The Permittee has not proposed any changes to the existing Title V operating permit as part of the renewal process. The last permit renewal was 03281T25 issued on November 6, 2012. On March 2, 2015, 03281T26 was issued as a minor modification under 15A NCAC 02Q .0515 for the following:

OMNOVA proposes to replace the smaller of the two oxidizers, C1, with a larger regenerative thermal oxidizer (ID No. C3). With the new oxidizer, the facility will be able to run all five presses simultaneous, which will allow the facility operational flexibility.

The facility is also requesting removal of the pyradia vinyl embosser (ID No. 7) under this permit modification.

II. Changes to Existing Title V Air Permit

The following table provides a summary of changes made to existing permit 03281T26:

Page No.	Section	Description of Change
Cover letter	N/A	Amended application type; permit revision numbers, dates and included updated letterhead.
1	Permit cover page	Amended permit revision numbers and all dates.

Page No.	Section	Description of Change
N/A	All, Header	Updated permit revision number. Added 0 to 2D and 2Q regulations.
3	Footnote to Section 1 Table	Removed footnote pertaining to minor modification under 15A NCAC 02Q .0515.
5	2.1 A.3.c.	Removed monthly visible emissions monitoring, recordkeeping, and reporting under 15A NCAC 02D .0521.
Global	Global	Replaced the word assure with ensure throughout permit, except General Conditions.
13	3	Updated General Conditions to latest shell version (v5.0).

III. Statement of Compliance

DAQ has reviewed the facility's compliance status. The facility was last inspected on February 22, 2017 by Mr. Jim Hafner of the Mooresville Regional Office (MRO). According to the inspection report, at the time of inspection the facility appeared to be operating in full compliance with all applicable requirements. Regarding the 5-year compliance history, the report notes the following:

A Notice of Deficiency (NOD) was issued on November 6, 2013 for failure a late quarterly report.
A Notice of Violation (NOV) was issued on March 10, 2014 for a late Annual Compliance Certification.
A Notice of Violation (NOV) was issued on August 5, 2014 for a late semi-annual report.

IV. Review of Applicable Regulations

A. Five rotogravure printing presses (ID Nos. 1, 2, 3, 4, and 6) and associated natural gas/propane-fired regenerative thermal oxidizers (ID Nos. C2 and C3)

1. Applicable Regulatory Requirements

- 15A NCAC 02D .0515,
- 15A NCAC 02D .0516,
- 15A NCAC 02D .0521,
- 15A NCAC 02D .0531(n),
- 15A NCAC 02D .0614,
- 15A NCAC 02D .0958 - This regulation is still applicable in RACT counties. Union County is a RACT county.
- 15A NCAC 02D .0959,
- 15A NCAC 02Q .0711,
- 15A NCAC 02Q .0317 for avoidance of 15A NCAC 02D .0530,
- 15A NCAC 02Q .0317 for avoidance of 15A NCAC 02D .1111,
- 15A NCAC 02D 1806,

- No new applicable regulations apply to these sources as part of the Title V permit renewal. According to the most recent inspection report, visible emissions observations are conducted as required on a monthly basis. Past observations consistently indicate 0% opacity. As recommended by the inspector, visible emission monitoring is removed from the permit upon this renewal. No other regulatory review is required at this time.

V. Compliance Assurance Monitoring (CAM)

Pursuant to 40 CFR 64.2, the provisions of the CAM rule are applicable to emission units that meet all of the following criteria:

- The unit is subject to an emissions limitation AND uses a control device to achieve compliance with the limit;
- The unit has pre-control potential emissions that are equal to or greater than 100% of the amount (in tpy) required for a source to be classified as a major source; and
- The unit is not exempt under 40 CFR 64.2(b).

The emission units are subject to CAM. The existing permit includes a condition referencing the facility's requirements under CAM. Monitoring, recordkeeping, and reporting are required. The existing condition is carried over to the renewed permit.

VI. Maximum Achievable Control Technology (MACT) Applicability

The existing permit includes an avoidance condition under 15A NCAC 02Q .0317 limiting hazardous air pollutant (HAP) emissions to less than 25 tons per year combined HAPs and 10 tons per year for individual HAP. With this condition, the facility is classified as a minor (area) source of HAP emissions. The existing condition is carried over to the renewed permit.

The existing natural gas-fired emergency generator (170 kW, ID No. IC-GEN1) is subject to MACT Subpart ZZZZ. The generator is included in the insignificant activity list with the MACT designation.

VII. Prevention of Significant Deterioration (PSD)

The existing permit includes an avoidance condition under 15A NCAC 02Q .0317 limiting VOC emissions to less than 250 tons per year. However, since the major source threshold in non-attainment areas is 100 tpy, OMNOVA is considered major under NAA NSR. The facility has not requested to remove the avoidance condition, and it will remain in the permit under this renewal.

VIII. New Source Performance Standards (NSPS)

No sources at this facility are subject to NSPS.

IX. State-only Toxic Air Pollutant (TAP) Procedures

The existing permit includes a condition referencing the requirements listed in 15A NCAC 02Q .0711 "Emission Rates Requiring a Permit." This regulation requires the facility to be operated and maintained in such a manner that TAP emissions do not exceed the toxic permit emission rates (TPER). The existing condition is carried over to the renewed permit. According to the inspection report, compliance is indicated.

X. Insignificant Activities

The existing permit includes a list of insignificant activities under 15A NCAC 02Q .0503(8). DAQ has confirmed that maximum emissions from these sources are less than 5 tpy of all regulated criteria pollutants and less than 1,000 lbs/year HAP. No new applicable regulations apply to these sources as part of the Title V permit renewal. No other regulatory review is required at this time.

XI. Permitting History Since Issuance of Title V Permit Renewal

The last permit renewal was 03281T25 issued on November 6, 2012. As noted above, the Permit was modified on March 2, 2015 under 15A NCAC 02Q .0515 "Minor Permit Modifications."

XII. Other Regulatory Considerations

- An application fee is not required for this renewal application.
- A zoning consistency determination is not required for this renewal application.
- A Professional Engineer's Seal is not required for this renewal application.
- DAQ Title V Equipment Editor (TVEE) database update was approved on June 19, 2017.

XIII. Draft/Proposed Permit Review Summary

- Mr. Jim Hafner, (MRO) was provided a draft permit for review on June 16, 2017. MRO responded on June 20, 2017 with minor comments. All comments were addressed.
- Mr. Jeff Hardin (OMNOVA) was provided a draft permit for review on June 16, 2017. OMNOVA responded on June 20, 2017 with minor comments. All comments were addressed.
- NCDAQ published a Public Notice of the proposed Title V permit renewal on XXXXX, 2017 on DAQ website. The public comment period expired on XXXXX, 2017 with comments received.
- U.S. EPA Region IV was provided a draft permit for review on XXXXX, 2017. EPA comment period expired on XXXXX, 2017 with comments received.

XIV. Recommendations

This Title V Permit Renewal for OMNOVA Solutions, Inc., Union County, North Carolina has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined that this facility appears to be complying or is expected to achieve compliance as specified in the permit with all applicable requirements. DAQ recommends of the permit renewal.